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14 UNITED STATES DISTRICT COURT

15 DISTRICT OF NEVADA

16 LISA MICHELLE RAMIREZ,

17 Plaintiff,

18 vs.

19 KILOLO KIJAKAZI,

20 Acting Commissioner of Social Security,

21 Defendant.

22 Case 2:22-cv-01734-DJA

23 UNOPPOSED MOTION FOR  
24 EXTENSION OF TIME  
*(SECOND REQUEST)*

25 Defendant, the Acting Commissioner of Social Security, respectfully requests an extension  
26 of 20 days in which to respond to Plaintiff's Motion for Reversal and/or Remand (ECF No. 12),  
27 filed on February 2, 2023, changing the date on which Defendant's response is due to April 25,  
28 2023, from April 5, 2023. This is Defendant's second request to extend time. Counsel for  
Defendant conferred with a representative for counsel for Plaintiff on April 4, 2023 and confirmed  
that Plaintiff has no objection to this request.

25 Defendant makes this request in good faith and for good cause. Upon closer review of the  
26 record, and while drafting Defendant's response, I discovered that settlement options may exist in  
27 this case. The extension is required, therefore, to permit me time to further research the issue that  
28 has come to my attention and to provide me time to see whether it warrants pursuing settlement.

1 Accordingly, I am asking the Court for 20 additional days to respond to Plaintiff's Opening Brief

2 For these reasons, the Commissioner respectfully requests that the Court grant this motion  
3 for an extension of 20 days for Defendant to respond to Plaintiff's Opening Brief.

4 DATED April 5, 2023.

Respectfully submitted,

5 JASON M. FRIERSON  
6 United States Attorney

7 s/ Julie A.K. Cummings

8 JULIE A.K. CUMMINGS  
9 Special Assistant United States Attorney

10 Attorneys for Defendant

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13 IT IS SO ORDERED:

14   
15 HON. DANIEL J. ALBREGTS  
16 UNITED STATES MAGISTRATE JUDGE

17 DATED: April 6, 2023

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